

Before the
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Washington, D.C. 20554

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Federal Communications Commission
Office of the Secretary

In the Matter of:

Broadcast Localism

MB Docket No. 04-233

COMMENTS OF THE AD COUNCIL

The Advertising Council ("Ad Council") submits these comments in response to the Federal Communications Commission's ("FCC" or "Commission") Report on Broadcast Localism and Notice of Proposed Rulemaking.

As the FCC considers enhancing localism, the Ad Council respectfully requests that public service announcements (PSAs)— and notably, nationally produced PSAs— be considered as part of a broadcaster's commitment to serving local needs and interests.

AD COUNCIL PSAs ADDRESS NATIONAL AND LOCAL ISSUES

Adopting a child from your local welfare system, preparing for a natural disaster in your community, finding out how to prevent losing your home to foreclosure, or finding a local blood bank in your neighborhood--these are the kinds of local resources Ad Council campaigns provide to all Americans whether they live in an urban or rural community, small town, large city or suburb. Our PSAs also raise awareness about issues that impact every resident, regardless of where they live, such as drunk driving prevention, seat belt safety, financial literacy, obesity prevention, online sexual exploitation, mentoring, child abuse intervention.

The Ad Council is able to drill these issues down to the local level through the generosity and support of the country's broadcasters: Every year, the Ad Council garners approximately \$1.2

billion in donated media from TV and radio stations for its PSA campaigns, which addresses many of the country's most pressing social issues. While nationally produced, either in partnership with a nonprofit or the federal government, most of the Ad Council's PSAs tackle issues that impact the daily lives of parents, children and families at the local level, such as reducing gun violence, foster adoption, promoting responsible fatherhood, disaster preparedness, foreclosure prevention, childhood literacy, amber alerts, and high-school drop-out prevention to name just a few.

While station PSA Directors consider numerous factors when selecting which PSAs to air, the Ad Council knows through its various national surveys of broadcast PSA directors that one of their top-rated requirements is that the PSA be relevant to its station's audience. Thus, the Ad Council strives to create PSAs that are both nationally and locally important. This emphasis on local relevance is supported anecdotally by feedback from the Ad Council's 10 Regional Managing Directors (RMD) who work closely with local broadcasters in the top DMAs. For every station visit, these RMDs bring along local statistics about how Ad Council campaigns are relevant and timely to local communities—information which is always well received by the station. The Ad Council receives similar feedback from broadcasters when they respond to our weekly and monthly email PSA updates that are sent to every broadcast outlet in the country.

MANY OF AD COUNCIL SPONSORS HAVE LOCAL AFFILIATIONS

Every Ad Council campaign is created in partnership with a nonprofit organization or federal government department. While most of these nonprofit organizations are nationally-based, many of them have local offices, chapters or alliances with grassroots groups that serve their local communities. These nonprofits include the American Red Cross, United Way of America, American Stroke Association, American Heart Association, NeighborWorks America, American's Second Harvest, United Negro College Fund, Big Brothers Big Sisters, Americans for the Arts, and the American Institute of Certified Public Accountants Foundation. For example,

-Early Childhood Development: This campaign, which teaches parents the importance of quality early learning experiences, is sponsored by the United Way of America which represents more than 1,300 locally governed chapters serving the local needs of communities

in all 50 states. Thus, the United Way's chapters are able to amplify the campaign message at the local level and provide information and resources.

-Stroke Awareness: The American Stroke Association (ASA) sponsors this campaign which raises awareness of stroke symptoms and response in order to lessen the devastating effects of stroke which is the third leading cause of death in America. The ASA, which is a division of the American Heart Association, operates 12 regional affiliates, representing 56 individual state and metropolitan affiliates, drawing on millions of local volunteers and donors for support. Their website local.strokeassociation.org allows the public to locate their local chapter for local events and resources.

-Foreclosure Prevention: This campaign encourages homeowners at risk of losing their homes to call 888-995-HOPE, where they will find quality counseling and financial advice regarding the opportunities available to avoid foreclosure. Sponsored by NeighborWorks America, the campaign draws on a network of community-based resources to help homeowner locally, including more than 230 community development organizations working in 4,400 urban, suburban and rural communities in all 50 states, the District of Columbia and Puerto Rico.

-Mentoring: Big Brothers Big Sisters (BBBS) sponsors this campaign which provides one-to-one mentoring relationships between adult volunteers and children in 460 programs throughout the United States. The campaign encourages individuals to volunteer for BBBS and share simple, life-changing moments with a child.

Similarly, many of the Ad Council's Federal government sponsors create or coordinate with local affiliates to amplify their campaign message locally. For example:

Underage Drinking: The sponsor of the Ad Council's underage drinking prevention PSA campaign--the U.S. Department of Health and Human Services' Substance Abuse and Mental Health Services Administration (SAMHSA)--works with a coalition of local networks, which is comprised of parent, youth, education, substance abuse prevention,

justice/law enforcement, highway safety, alcohol control, local government, and business entities to help address the issue locally.

Drawing on this network of local affiliates, SAMHSA held town hall meeting to raise awareness of underage drinking in both 2006 and 2008. In 2008, over 1200 Town Hall Meetings will take place across the country during the first week of April--the nationwide effort will support the goals of the *Surgeon General's Call to Action to Prevent and Reduce Underage Drinking*, and give local communities the opportunity to come together to learn more about the new research on underage drinking and its impact on both individuals and the community. The meetings are designed to alert and empower the community as well as generate interest from the media.

Emergency Preparedness: The U.S. Department of Homeland Security's *Ready* campaign, which educates Americans to prepare for emergencies and natural disasters, works closely with state and local Office of Emergency Management teams and local Citizen Corps Councils to involve community members in emergency preparedness, planning, mitigation, response, and recovery. In 2007, more than 1,800 national, regional, state and local organizations participated in National Preparedness Month, a nationwide effort held each September, by distributing information and hosting events in their local communities.

Adoption: This campaign, with the U.S. Department of Health and Human's Services' Administration for Children and Families, helps to raise awareness of the significant number of children in foster care who are waiting to be adopted. The campaign relies on the Adoption Exchange Association, which is an alliance of States and Tribes that provide prospective adoptive parents access to local information about children in their area who are available for adoption.

AD COUNCIL "LOCALIZES" ITS CAMPAIGNS

Knowing how important locally-relevant issues are to the media and general public, the Ad Council has undertaken a major "localization" effort in order to maximize our support and success. This includes a host of initiatives including 1) creating localized version of our PSAs; 2) using "bites and

b-roll packages" and other public relations tactics to customize campaign launches locally; 3) training the local affiliates of our nonprofit or federal government sponsors, 4) hiring local media outreach specialists (Regional Managing Directors) and 5) creating Regional Leadership Committees comprised of top media, marketing and advertising stakeholders in 13 different cities.

Localizations: Because of the enormous cost efficiencies, Ad Council PSAs are typically produced as national versions but are created so that they are adaptable and relevant to every community. This allows the Ad Council to provide a large and diverse docket of PSAs for the media to choose from (at any given time, the Ad Council has 50 different PSA campaigns covering a myriad of social issues based on our three themes of education, community and health and safety.)

One of the more common Ad Council practices is to "localize" our PSAs, whereby we place a tag on end of the PSA (typically in the last 5 seconds of a 30-second TV or radio PSA). Working in partnership with our nonprofit sponsor we then list the local chapter's name, website (and sometimes phone number) so that the public can be linked to local services and resources.

More typically, the Ad Council will provide a national website or telephone number whereby the public can connect to local resources in their community. This often is more efficient as many local chapters of a national organization have limited staffing and resources and are not able to provide 24-hour service. Moreover, national fulfillment hotlines and websites generally have better quality controls, ensuring that inquiries are responded to promptly. National calls-to action also permit better tracking and measurement of consumer response and inquiries can be directed to the appropriate local office when multiple choices are available. For example, for the Ad Council's foster adoption campaign, our partnering organization (the Adoption Exchange Association) directs callers to their national number to a "recruitment response team" in their state to assist them with the adoption process locally.

Locally customized launched & PR practices:

Oftentimes, the Ad Council will customize a PSA campaign launch locally in order to emphasize how the issue impacts local communities. For example, the Ad Council will often create a localized Bites & B-Roll feed (BBR) which might include issue experts, real life stories, and local statistics

about the campaign issue. Whenever possible, the Ad Council will provide the media with access to statistics and local experts who can help localize the issue for their audience. The success of these localized launches has been enormous, reflecting the media's response to raising awareness about issues important to their viewers and listeners.

For example, for the Department of Transportation's drunk driving campaign, the Ad Council partnered with the Television Bureau of Advertising (TVB) and created an industry "roadblock" through which all local broadcast TV stations were encouraged to donate airtime for the "Buzzed Driving" TV PSAs during the holiday week launch. This complemented an integrated communications program whereby the Ad Council created localizable press release, BBRs, web packages and mat releases and pitched reporters at broadcast, print and online media outlets throughout the country.

As a result of the localized BBR package, the campaign was featured in 932 local broadcast news segments on 336 television stations in 168 markets, including stations in all of the top 30 national media markets. Additionally, the campaign was highlighted in radio segments throughout the country. Moreover, as part of the roadblock, over 800 local broadcast TV stations ran the "Buzzed Driving is Drunk Driving" PSA for the entire month of December (2007), garnering over \$4.5 million in donated media.

Similarly, the Ad Council launched a localized radio media tour for its foster adoption campaign in 2007, which reached over 6 million and relied on local statistics, needs and spokespersons. In one month alone, there were 16 interviews, which reached 2,589 affiliates in 11 markets.

Media Outreach Training

Recognizing the increasing importance of grassroots organizations and local media working together for the benefit of the community, the Ad Council provides media outreach training, tools and assistance to our campaign partners' local offices and affiliated groups. Many of these local organizations do work with the media to promote events such as walkathons, funding and advocacy, but they often lack the knowledge and resources to conduct media outreach for their organization's

PSA campaign. Ad Council workshops and one-on-one meetings with local groups give them the skills and the motivation to include the local media as partners in their programs.

Local outreach to the media:

The Ad Council employs a team of ten RMDs, who are strategically located in the country's top DMAs (San Francisco, Los Angeles, Washington DC, New York, Boston, Dallas, Chicago, Miami, Detroit and Atlanta) and promote the Ad Council's PSAs to stations located in the country's primary and secondary markets. Oftentimes, the RMDs will put stations in touch with local spokespeople, local stories, and local statistics for a particular PSA campaign for their community affairs programs and editorial programming.

In addition, in thirteen cities, the Ad Council has created local Regional Leadership Committees, which are comprised of the top media, agency and advertising executives in the area and serve much like a local Board of Directors. They advise the Ad Council on which local issues need the most support and help with outreach to their communities. (Please see attached a list of the members of the Ad Council's Leadership Committees.)

In several markets the RMDs and Leadership Committees have worked with the Mayor's office to promote an issue of local relevance (based on the needs of that particular locality.) For example, in northern California, the Ad Council convened over 7 counties in the Bay Area, in partnership with the San Francisco's Mayor's office, to create a local version of the U.S. Department of Homeland Security's disaster preparedness campaign. Called "72hours.org", the initiative calls on local residents to be prepared in times of man-made or natural disasters and has received strong support from local TV stations to date.

In Detroit, the Regional Leadership Committee put substantial support behind the Ad Council's foreclosure prevention campaign which links homeowners at risk of losing their homes with local resources (counseling and financial advice) from a trusted, third-party nonprofit. The broadcasters dedicated support lead to a 227% increased in call volume from Michigan homeowners to the 888-995-HOPE hotline (an increase from 2,043 to 6,671 calls). In addition, due to the Committee's efforts, the Detroit Free Press and Detroit News ran full page and quarter page ads.

The Ad Council currently has seven local launch events scheduled for this spring in major cities, which will include local celebrities, government officials, charities and news media.

CONCLUSION

For over 65-years, the nation's broadcasters have steadfastly supported Ad Council PSAs. In doing so, they have allowed the Ad Council to raise awareness of the most critical issues facing our nation and provide resources to communities at both the national and local level.

We therefore respectfully request that the Commission consider PSAs – whether nationally or locally produced – as a key component of a station's commitment to localism.

Respectfully submitted,

THE ADVERTISING COUNCIL

A handwritten signature in cursive script that reads "Peggy Conlon".

Peggy Conlon
President & CEO

The Advertising Council
261 Madison Avenue
New York, New York 10016

March 10, 2008

ATTACHMENT: Ad Council's Regional Leadership Committees

Name	Title	Company
<u>New York</u>		
Kathy Crawford	President, Local Broadcast	MindShare
Lew Leone	Vice President/General Manager (WNYW-TV & WWOR-TV)	Fox Television Stations
Ramon Pineda	Vice President/General Manager (WXTV-TV & WFUT-TV)	Univision Television Group
David Kline	President & Chief Operating Officer	Rainbow Advertising Sales Corp.
Dan Halyburton	Senior VP & Market Manager	Emmis Radio
Ryan McInerney	Senior Vice President Retail Marketing	J.P. Morgan Chase
<u>Chicago</u>		
Emily Barr	President/General Manager--WLS-TV	ABC, Inc.
Neil Golden	Senior Vice President/Chief Marketing Officer-USA	McDonald's Corporation
Renetta McCann	Chief Executive Officer	Starcom MediaVest Group
Earl Jones	President and Market Manager	Clear Channel Radio Chicago
McGhee Williams	Co-CEO	Burrell Communications Group
<u>Detroit</u>		
Anthony Hopp	Chairman, Chief Executive Officer	Campbell-Ewald
Andy Jung*	Senior Director Advertising & Marketing	Kellogg Company
Til Levesque	President and Market Manager	Clear Channel Radio - Detroit
Jessica Pellegrino	General Manager WUDT-TV	Equity Broadcasting
Don Coleman	Chairman & Chief Executive Officer	GlobalHue
Jeff Murri	Vice Pres & General Manager WJBK-TV Fox2	Fox Television Stations
<u>San Francisco</u>		
David Karnstedt	Senior Vice President, Sales	Yahoo
Gary Elliott	Vice President, Brand Marketing	Hewlett-Packard
Ed Krampf	Senior Vice President, Northwestern Region	Clear Channel Radio
Ron Longinotti	President/General Manager--KPIX-TV & KBHK-TV	CBS Television Stations
Jamie King	CEO/President	Hal Riney Partners
<u>North Texas</u>		
Jaya Kumar	Chief Marketing Officer	Frito Lay Corporation
Kathy Clements	Senior Vice President/Television Operations	Belo Corporation
Scott Crockett	Principal	The Richards Group
J.D. Freeman	Executive Vice President & Market Manager	Clear Channel Radio - Dallas
Tom Hansen	Chief Executive Officer & President	TM Advertising
<u>Miami</u>		
Luis Fernandez-Rocha	Vice President, GM (WLTU Univision 23, WAMI Telefutera 69)	Univision Television- Miami
Jim Poh	Executive Vice President, Media Director	Crispin Porter
Tom Doerr	Station Manager, WFOR/WBFS	CBS Television Stations
George Toulas	President/Market Manager	Clear Channel Radio - Miami
Claudia Puig	General Manager	Univision Radio- Miami
Fred Zuckerman	Executive VP Media	Zimmerman Advertising
Aaron Burns	Senior Global Manager, New Trademark Development	Bacardi Global Brands

Boston

Anne Finucane
Joe Grimaldi
Bill Fine
Phil Redo
Alex von Lichtenberg

Chief Marketing Officer
President
President & GM WCVB-TV
General Manager
General Manager

Bank of America
Mullen
Hearst-Argyle
Greater Media Radio
Telefutura, Boston

Atlanta

Chuck Fruit
Cathy Coffey
Daryl Evans
Rick Caffey
Tom Fuller
George Newi
Tom Stevens
William S. Hoffman

Senior Advisor
Vice President Advertising
VP-Advertising & Marketing Communications
Senior VP, Market Manager
Chief Operating Officer
Senior VP, Account Director
Senior VP, Sales
VP/GM

Coca Cola
Cox Enterprises
AT&T Inc.
CBS Broadcast, Atlanta
Twenty Two Squared
Initiative Media Atlanta
TBS Atlanta
WSB-TV Atlanta

Los Angeles

Sue Johnning
Maelia Macin
Jeff Federman
Don Corsini
Scott Remy

EVP Media
GM
VP Market Manager
President & GM, KCBS-TV & KCAL-TV
Senior VP Communications

Initiative Media
KMEX & KTFR (Univision)
CBS Radio
CBS Television
NestleUSA

Washington DC

Stew McHie
Doug Laughlin
Joel Oxley
Michelle Williams
Michael Jack
Stephen Hills

Global Brand Manager
President & CEO
Senior Vice President & Market Manager
Vice President & General Manager
President & General Manager WRG-TV4-DC
President & General Manager

Exxon-Mobil Fuels Marketing
LM&O Advertising
Bonneville Radio
Radio One
NBC-Universal
The Washington Post

Philadelphia

Michael Colleran
John Fullam
Paul Alexander
Andy Rosen
Joanne Harmelin
Jim Gallagher

President & General Manager KYW-TV & WPSG-TV
VP/Market Manager
Vice President Global Advertising
Senior Vice President & Market Manager
CEO & Founder
Vice President/General Manager

CBS Television
Greater Media Radio
Campbell Soup
Radio One
Harmelin Media
Comcast Spotlight

Houston

Alex Lopez-Negrete
Craig Bland
Laura Morris
Larry Blackerby
Melissa Stevens

President
President & General Manager KXLN-TV & KFTH-TV
President & General Manager
Vice President and General Manager KPRC-TV
President

Lopez Negrete
Communications
Univision
CBS Radio
Post-Newsweek
FKM Agency

Tampa-St. Petersburg

Mike Pumo

Jody Bilney

Luis Diaz-Albertini

Lilly Gonzalez

Jill Caruso

President & General Manager WFLA-TV

Chief Marketing Officer

General Manager

General Manager WVEA-TV & WFTT-TV

Regional Director of Sales

Media General

Outback Steakhouse

CBS Radio

Entravision

Brighthouse Networks